

JOSHUA GOLDEN AND LISA GOLDEN,  
Plaintiffs,  
vs.  
UNITED VAN LINES, LLC, LEXICON  
RELOCATION, L.L.C., SUDDATH  
RELOCATION SYSTEMS OF CHARLOTTE,  
LLC a/k/a SUDDATH OF CHARLOTTE,  
SUDDATH VAN LINES, INC., PLANES  
MOVING & STORAGE, INC. AND JOHN  
DOES 1 THROUGH 10.  
Defendants.

**PLAINTIFF'S ANSWERS TO LOCAL  
CIVIL RULE 26.01 INTERROGATORIES**

A. State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

B. As to each claim, state whether it should be tried jury or non-jury and why.

C. State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner or affiliate; (2) each publicly owned company which owns ten

percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding share.

**Response: Plaintiffs are individuals.**

- D. State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

**Response: Venue is proper in this division because Plaintiffs are residents of this division, the Home where the property was transported to and delivered in its damaged condition is in this division, and Plaintiffs are informed and believe that a portion of the damage and loss to their property took place within this division. Thus, this is the appropriate venue and division under 49 U.S.C. §14706(d).**

- E. Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action.

**Response: None.**

- F. Parties or Intervenor in a Diversity Case. In an action in which jurisdiction is based on diversity under 28 U.S.C. §1332(a), a party or intervenor must, unless the court orders otherwise, name – and identify the citizenship of – every individual or entity whose citizenship is attributed to that party or intervenor. This response must be supplemented when any later event occurs that could affect the court’s jurisdiction under §1332(a).

**Response:     Plaintiffs are citizens of South Carolina.**

Respectfully submitted,

The Floyd Law Firm

/s/ James L. Floyd, III

James L. Floyd, III (“Lee”)

Fed Bar No.: 10076

3255 Maybank Highway

Johns Island, SC 29455

Phone: (843) 258-1200

Email: [lfloyd@floydlawsc.com](mailto:lfloyd@floydlawsc.com)

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Charleston, South Carolina